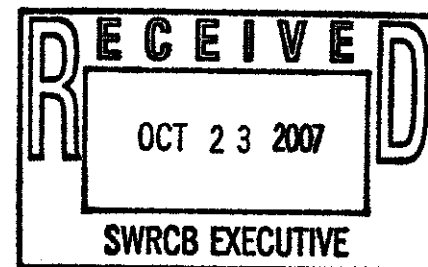


October 19, 2007

Ms. Jeanine Townsend, Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



RE: Comment Letter – Water Recycling Policy

Dear Ms. Townsend:

In response to the State Water Resources Control Board's (Board) Notice of Opportunity for Public Comment on a Draft Certified Regulatory Program Environmental Analysis Concerning a Proposed Water Recycling Policy issued on September 28, 2007, the Water Replenishment District of Southern California (District) is submitting the following comments for your consideration. The District currently utilizes 70,000 afy of recycled water for groundwater replenishment in the southern area of Los Angeles County and plans to use significantly more in the future. These comments are directed to those portions of the draft policy that pertain to groundwater recharge with recycled water. The District considers the use of recycled water to be absolutely vital for sustaining water supplies in the future and is appreciative of the Board's overall support for water recycling and its efforts to develop statewide consistency in this document.

In "Whereas No. 15", it is noted that the California Department of Public Health (CDPH) establishes recommendations and requirements for groundwater recharge projects to protect public health. In addition, the CDPH is currently developing draft groundwater recharge regulations that will update their criteria and conditions for future projects. Therefore, regarding "Resolutions Nos. 10 – 13," they should clearly state that the Regional Water Quality Control Boards (RWQCB) should defer to CDPH for prescribing appropriate and adequate requirements for groundwater recharge projects to protect public health and not prescribe additional requirements, especially water quality numerical limits for unregulated chemicals that have no MCLs. CDPH requirements are many and include strict water quality limits of the recycled water and diluent water, minimum retention times before the recycled water can be extracted from downgradient domestic wells, blending as needed, and very comprehensive monitoring of the recycled water and groundwater, both for regulated and unregulated chemicals, before it is extracted for domestic use.

Mr. Robb Whitaker, General Manager of the District, stated in oral comments to the Board on October 2, 2007 that the policy should be consistent with your Board Order No. WQ 2006-001. This was adopted on April 2, 2006, and rescinded effluent limits of chemicals with state Notification Levels, i.e. unregulated chemicals, in Order No. R4-2005-061 for the Alamitos

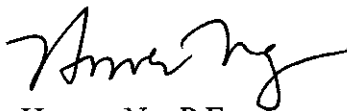
Barrier Recycled Water Project. We again reiterate our request that the draft water recycling policy should be consistent with this order.

Agencies currently conduct comprehensive monitoring for both regulated chemicals with MCLs and unregulated chemicals with no MCLs. By doing so, we obtain information that allows both the regulatory agencies and permittees to investigate further if the results of monitoring show that unregulated chemicals are present and, more importantly, are persisting. However, until unregulated chemicals have undergone the formal process to have MCLs established, which includes a thorough review of health effects as well as consideration of technical and economic feasibility, it would be premature for RWQCB's to create numerical limits for them in recycled water projects. To do so would undermine and preempt the responsibility and the efforts of the CPDH, who are charged with protecting public health in our drinking water supplies. They already require monitoring for many unregulated contaminants, including pharmaceuticals and endocrine disrupting chemicals, in several recently permitted projects and have also included this requirement in their draft groundwater regulations for future projects.

The District also supports the comments of the WateReuse Association, who will be submitting their comments separately.

If there are any further questions, please contact me at 562 407-1905 or hng@wrd.org.

Yours truly,



Hoover Ng, P.E.
Water Quality Program Manager

C: Mary Grace Pawson, WateReuse Association
Roberta Larson, WateReuse Association, Legal Counsel